

FEDERATED STATES OF MICRONESIA  
SUSTAINABLE ENERGY DEVELOPMENT  
AND ACCESS PROJECT (SEDAP)

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Environmental and Social Management  
Framework and Environmental and Social  
Management Plan

Grievance Redress Mechanism  
(Projects Complaint Process)

November 2021

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## **Grievance Redress Mechanism (GRM) – Projects Complaints Process**

### **1 Background**

During the construction and implementation phases of the Sustainable Energy Development and Access Project (SEDAP), a person or group of people can be adversely affected, directly or indirectly due to the projects activities. The grievances that may arise can be related to social issues such as eligibility criteria and entitlements, disruption of services, dissatisfaction regarding land and/or asset disturbance, entitlements or valuation, temporary or permanent loss of livelihoods Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and other social and cultural issues.

Grievances may also be related to environmental issues such as excessive dust or noise generation, damages to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestions, changes to land and property access and associated issues.

Should such a situation/s and/or issues arise, there must be a mechanism through which affected parties can resolve such issues in a cordial manner with the SEDAP personnel in an efficient, unbiased, transparent, timely and cost-effective manner.

To achieve this objective, an updated Grievance Redress Mechanism (GRM) has been developed for the preconstruction, construction and operational phases of the project to specifically include issues relating to GBV, SEA and SH

Managing complaints of GBV/SEA/SH requires different approaches than other types of complaints due to: sensitivity of the violence; the potential for survivors to experience stigma, rejection, or harm; and because of the reluctance of many survivors to come forward. Additional mechanisms are needed that create safe, enabling spaces for survivors to report GBV/SEA/SH that offer a safe, ethical, survivor-centered response. Thus, survivor safety, choice, confidentiality and consent must be systematically applied to all complaints of GBV/SEA/SH. For this reason, the SEDAP GRM includes a specific pathway to receive and resolve complaints of GB/SEA/SH related issues.

### **2 FSM Judiciary Level Grievances**

The project level process will not impede affected persons access to the FSM legal system. At any time, a complainant may take the matter to the appropriate legal (Police) or judicial authority as per the laws of the FSM. These matters may include where an alleged crime had occurred such as illegal use of drugs, child labor, GBV/SEA/SH and so forth. SEDAP will not interfere will any formal legal process relating to a complaint.

## **3 Grievance Redress Mechanism (GRM) – Complaints Process**

### **3.1 Introduction – Functions and Benefits**

The FSM SEDAP project allows those that have a complaint or those feel aggrieved by the projects to be able to communicate their concerns and/or grievances through an appropriate process. The GRM set out below is to be used as part of the SEDAP

project and will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable individual and/or group who often lack access to formal legal regimes.

While recognizing that many complaints may be resolved immediately, the Complaints Register (CR) and GRM set out below encourages mutually acceptable resolution of issues as they arise. The CR and GRM has been designed to:

- a) Be a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed in a confidential, fair and transparent manner;
- b) Allow simple and streamlined access to the CR and GRM for all stakeholders and provide adequate assistance for those that may have faced barriers in the past to be able to raise their concerns;
- c) Provide clear and known procedures for each stage of the GRM process, and provide clarity on the types of outcomes available to individuals and groups;
- d) Ensure equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that, is confidential, fair, informed and respectful to a complaint and/or concern;
- e) Provide a transparent and confidential approach, by keeping any aggrieved individual/group informed of the progress of their complaint, the information that was used when assessing their complaint and information about the mechanisms that will be used to address it; and
- f) Facilitate continuous learning and improvements to the GRM. Through continued assessment, the learning's may reduce potential complaints and grievances.

### **3.2 GRM Eligibility Criteria**

Local communities and other interested stakeholders may raise a grievance/complaint at any time to the traditional leaders and/or government elected officials. Affected local communities should be informed about the ESMF provisions of the SEDAP project, including its GRM and how to make a complaint. Specific awareness will be conducted with women in local communities associated with the SEDAP project on the process of lodging a grievance complaint related to GBV/SEA/SH to the GRM, and on how to access other service providers; such as justice, health, counseling, safe accommodation. This will ensure the SEDAP project provides a safe, confidential and enabling environment for women to access information and report an GBV/SEA/SH compliant. Eligibility criteria for the GRM include:

- a) Perceived negative economic, social or environmental impacts on an individual and/or group, or concern about the potential to cause an impact;
- b) Clearly specified types of impact that has occurred or has the potential to occur and explanation of how the project caused or may cause such impact; and
- c) Individual and/or group filing of a complaint and/or grievance is impacted, or at risk of being impacted; or the individual and/or group filing a complaint and/or grievance demonstrates that it has authority from an individual and or group that have been or may potentially be impacted on to represent their interest.

### **3.3 Grievance Redress Mechanism (GRM) Pathways and Processes**

The GRM has been designed to be problem-solving mechanism with voluntary good-faith efforts. The GRM is not a substitute for the legal process. The GRM will as far as practicable, try to resolve complaints and/or grievances on terms that are mutually acceptable to all parties, while recognizing that for some issues, such as GBV/SEA/SH, a mutually resolution is less likely. When making a complaint and/or grievance, all parties must act at all times, in good faith and should not attempt to delay and/or hinder any mutually acceptable resolution. However, the GM also recognizes that for some complaints, such as those of GBV/SEA/SH, the survivor will likely face multiple barriers to making a complaint and access required support. Where such barriers exist, this is not construed as deliberate attempts to delay or hinder the resolution process.

The SEDAP GRM process includes two distinct grievance pathways which include a project general GM and a GBV/SEA/SH specific GRM. The two pathways are detailed below.

#### **3.4 General GRM**

The process for the GRM is as follows:

- a) The Aggrieved Party (AP) takes their grievance to the SEDAP Project Implementation Unit (PIU) State Focal Point, Contractor or contact through the DoFA website or email. In the pre-construction period, there will be no contractor as such the PIU and/or the DoTC&I are the appropriate entities. Once construction commences, the contractor becomes the initial focal point for information and/or grievance/complaint;
- b) During both pre- and post-construction periods, the SEDAP Project Manager and/or PIU on behalf of the secretary of DoTC&I will endeavor to resolve any complaint - issue as soon as practical. Where the Aggrieved Person (AP) is not satisfied, the SEDAP Project Manager will refer the Aggrieved Person to the PIU whom in turn will inform the Secretary of DoTC&I and the Central Implementation Unit -CIU (Program Officer and Safeguard team). For complaints that were satisfactorily resolved the incident and resultant resolution will be logged and reported to the SEDAP Project Manager, and copied to the CIU (Program Officer and Safeguard Team);
- c) If unsuccessful, the SEDAP Project Manager notifies the PIU whom in turn notifies DoTC&I;
- d) The SEDAP Project Manager endeavors to address and resolve the complaint and inform the Aggrieved Party. For complaints that were satisfactorily resolved by the SEDAP Project Manager, the incident and resultant resolution will be logged by this individual and copied to the PIU and CIU (Program Officer and Safeguard Team). Where the complaint has not been resolved, the SEDAP Project Manager notifies the PIU whom in turn notifies the Secretary of DoTC&I for his/her action/resolution;
- e) If the matter remains unresolved, or the Aggrieved Person is not satisfied with the outcome, the Secretary of DoTC&I refers the matter to the Project Steering Committee for a resolution. The SEDAP Project Manager will log details of the issue and resultant resolution status (copy to PIU and CIU Project Officer and Safeguard Team); and

- f) If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the Aggrieved Person may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.

Steps “a” through “e” should be undertaken immediately. Where the matter is referred to the SEDAP Project Manager, a resolution should be sought within two weeks. If unsuccessful and the matter is referred to the Project Steering Committee, this should occur within a month.

Each record is to be allocated a unique number, reflecting year and sequence of received complaint (for example 2021-01, 2021-02 etc.). Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy.

Any grievance related to corruption or another criminal offence, with the exception of complaints relating to GBV/SEA/SH (which should follow the GBV/SEA/SH specific GM outlined below), needs to be managed confidentially through the following process.

- a) The aggrieved party/ies take their grievance to the relevant Municipal, State and/or National Police and notifies the SEDAP Project Manager.
- b) The SEDAP Project Manager notifies the PIU, the Secretary of DoTC&I and CIU (Program Officer and Safeguard Team).
- c) If the grievance includes an alleged crime, with exception of GBV/SEA/SH, the SCORE Project Manager will notify the state and national legal offices (e.g., Police or Department of Justice) and report the incidence.
- d) Resolution of these grievances will be the responsibility of the legal systems within each state and/or national agencies as dictated by state and national law. In these cases, the projects grievance mechanism will ensure the above due diligence is enacted and due process is documented with the grievance given a complaint number and recorded. Confidentiality associated with all criminal cases must be compliant and follow State and National laws.

### **3.5 GBV, SEA or SH Specific GRM**

Survivor-centered guiding principles will be systematically applied through all steps and actions. These guiding principles are as follows:

- The safety of the survivor shall be ensured at all times. Potential risks to the survivor will be identified and action taken to ensure the survivor’s safety and to prevent further harm including ensuring that the alleged perpetrator does not have contact with the survivor. If the survivor is an employee, reasonable adjustments may be made to the survivor’s work schedule and work environment to ensure their safety.
- All actions should reflect the choices of the survivor.
- All information related to the case must be kept confidential and identities must be protected. Only those who have a role in the response to an allegation

should receive case-level information, and then only for a clearly stated purpose and with the survivor's specific consent.

- The survivor must provide informed consent to progress with each stage of the complaints process. Survivors may withdraw their consent during the process at any time.

Any grievance related to a complaint of GBV, including but not limited to SEA and/or SH, or domestic violence needs to be managed confidentially through the following process:

### **Step 1: Receive the complaints of GBV/SEA/SH**

- a) Complaints of GBV/SEA/SH can be received by:
  - The existing channels of the GRM.
  - The GBV service providers / trainers / women's rights advocates who are women and experienced in responding to GBV.
- b) If the person making the complaint is the survivor (the person who the alleged violence was directed towards) and the complaint relates to SEA or SH, the person who received the complaint will:
  - Tell the survivor about the closest GBV service providers including justice, health, safe accommodation and / or counseling (see Annex 1).
  - Document and register the allegation using Form A in Annex 2.
  - Explain the GM complaints and reporting process to the survivor including:
    - The process.
    - That they (the survivor) can choose whether they want to make a formal complaint to the project.
    - That if they choose to make a formal complaint to the project:
      - They control whether and how information about the case is shared with other agencies or individuals.
      - All information will be kept confidential. Only those who will respond to the case will be told about their complaint / situation.
      - If they agree, another person will contact them to talk with them more about their complaint and explain that they can choose whether this is a man or a woman. It should also be identified who these people are in case there are concerns about speaking to a specific person (for example, if they are related to / close to the alleged perpetrator).
      - They can change their mind and withdraw their consent at any time and the process will stop.
  - Information about the complaint will be kept confidential. Information captured on Form A in Annex 2, should not identify the survivor, perpetrator or include any other information that will identify the survivor of specific situation.
  - If the survivor chooses to make a formal complaint to the GRM, communicate the allegation to SEDAP Manager of Operations using Form B and providing a copy of Form A in Annex 2.
  - If the survivor chooses not to make a formal complaint to the GRM, they should be reminded about the closest GBV service providers and told that if they change their mind, or if something else happens, they can always make a complaint in the future.
- c) If the survivor of the alleged violence is a child, under the age of 18 years of age, while mandatory reporting does not apply to SEDAP project, it is

considered good practice for any suspected or known harm to children to be reported to the police or a welfare officer for further investigation. Where the alleged abuse is criminal, such as physical or sexual violence or neglect by parents or caregivers it should be reported to the police with the consent of the child and/or their guardian.

- d) If the person making the complaint is the survivor (the person who the alleged violence was directed towards) and the complaint relates to other forms of GBV, the person who received the complaint will:
  - Tell the survivor about the closest GBV service providers (see Annex 1).
  - Document and register the allegation using Form A in Annex 2.
- e) If the person making the complaint is a third party (not the person who the alleged violence was directed towards such as a family member, community member, colleague, friend), the person who received the complaint will:
  - In cases of **GBV/SEA/SH**:
    - Document and register the allegation using Form A in Annex 2.
    - Explain that the project cannot receive third-party complaints because we need to make sure the survivor is safe and that we are acting in their best interests.
    - Ask them to tell the survivor about the available options for reporting or accessing support services.

## **Step 2: Communicate with the Survivor – Ongoing**

- a) SEDAP Project Manager should be the only person to communicate with the survivor. Where the survivor has chosen to speak to a woman, a woman (who has been trained in handling complaints of GBV – SEA/SH) will be delegate this role by the SEDAP Project Manager.
- b) This communication should include:
  - Responding to any questions or concerns from the survivor.
  - Ensuring that the survivor has received appropriate support.
  - Asking for the survivor's consent (using Form C in Annex 2) at each stage in the process.
  - Gathering any further information that may be required from the survivor.
  - Explaining that where the allegation involved a criminal offence the survivor should consider going to the police.
- c) The survivor will be provided ongoing feedback on the development and outcome of their case but especially when:
  - The complaint is received.
  - The case is referred to the SEDAP Project Manager.
  - The verification process commences or when a determination is made that there is an insufficient basis to proceed.
  - The outcome of the verification process and any disciplinary action.
  - When disciplinary action has been.

## **Step 3: Assess if the Allegation is likely linked to the project**

- a) The SEDAP Project Manager will determine the likelihood of the allegation being linked to a project.
- b) If the allegation is determined to be likely linked to a project, the SEDAP Project Manager will:



- Inform PIU and Secretary of DoTC&I within 48 hours of the determination being made sharing only the following information:
  - The nature of the allegation;
  - If the alleged perpetrator is, to the survivor's best knowledge, associated with the project (yes/no);
  - The survivor's age and/or sex (if available); and
  - If the survivor was referred to services.
- DoTC&I must notify the World Bank (WB) Task Team immediately sharing only the same information. No further information, including name and contact details of the survivor or alleged perpetrator should be shared with the WB Task Team (or anyone else, except in the context of referral for services or verification, with the consent of the survivor). While any kind of GBV case could be brought to the attention of a project implementation unit, allegations only need to be reported to the World Bank if they involve SEA or SH.

#### **Step 4: Verify and Act**

- a) If an allegation is determined to be likely to be linked to a project, the SEDAP Project Manager will convene the ad hoc GBV Grievance Committee who will:
- Convene a meeting to review the complaint and decide on the verification process within 48 hours of the determining that the allegation is likely linked to the project. The goal of the verification is to:
    - Determine the likelihood that the incident occurred.
    - Recommend disciplinary measures towards the alleged perpetrator of SEA and SH.
  - Interview all the people involved to gather as much information as possible about what happened. This will usually include interviewing:
    - The survivor.
    - Any witness(es).
    - If there are people that the survivor has been informed about the incident.
    - Review any other evidence, if available, like text messages or social media posts.
    - The alleged perpetrator.
    - Sometimes there will only be limited information.<sup>1</sup> Building trust with the survivor is very important because the more that they trust the

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<sup>1</sup> In most SEA and SH cases:

- Often there are no witnesses to the alleged incident. Often the alleged perpetrator makes sure that no one sees or knows about the incident but this did not mean that the incident did not happen. Someone making a complaint of SEA or SH does not need to provide a witness or 'evidence' to prove their claim. Survivors face multiple barriers to reporting SEA and SH. When people overcome so many barriers to report SEA and SH, it is unlikely that they are lying. When people come forward, they are supported even if there is not clear evidence one way or another.
- The person alleged of the violence will often deny that they did what was/is alleged or might they will say it was consensual. Just because the person denied the allegation does not mean it did not happen.
- The survivor may not tell the whole story straight away. They might leave out parts of the story of what happened because they are afraid that they might not be believed or that they will be blamed for what happened. This does not mean the incident did not occur.

project, the more that they might share about what happened which will help with the verification.

- After gathering the available information, the GBV Grievance Committee should determine whether it is likely that the incident did or did not occur within and completed within 14 days of starting the verification process. It is not the role of the adhoc GBV Grievance Committee or the project to investigate an allegation and determine if it did or did not happen. This is the role of the police and courts. The role of the adhoc GBV Grievance Committee is to determine the likelihood that the incident occurred given the information available.
  - If it is determined that it was likely to occur, disciplinary action should then be agreed.
  - All verification steps and meetings must be documented with information kept confidentially.
    - The survivor can report the allegation to the police at any time and does not need to inform the SEDAP Project Manager or GBV Grievance Committee that they are doing or have done this. If the survivor chooses to make a complaint to the police this process is separate to the GRM verification.
    - The GBV Grievance Committee may decide to suspend the alleged perpetrator from their employment while the police are investigating / court is hearing the case. However, in FSM the average time to resolve a sexual offences case is 2 years so this will likely not be practical in most situations.
- b) If the ad hoc GBV Grievance Committee decides that it is likely that the allegation occurred, the employer of the perpetrator implements the recommended disciplinary action, that is proportional to the nature and severity of the incident; in accordance with local legislation, the employment contract and the code of conduct.
- Sanctions applied by the perpetrator's employer may include:
    - Informal warning.
    - Formal warning.
    - Additional training.
    - Loss of salary for a period of time.
    - Suspension of employment (without payment of salary), for a period of time.
    - Termination of employment.
    - Referral to the police or other authorities as warranted, with the consent of the survivor.
- c) Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.
- d) In cases of GBV related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.
- e) In cases of GBV related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

## Step 5: Document and Monitor Complaints of GBV

- a) Each individual complaint of GBV will be documented and registered using Form A.
- b) Informed consent will be captured using Form C.
- c) Each record is to be allocated a unique number, reflecting year and sequence of received complaint (for example 2021-01, 2021-02 etc.).
- d) The SEDAP Project Manager will compile quarterly reports to DoTC&I including:
  - The number of complaints related to GBV disaggregated by the number of complaints where:
    - That the survivor was referred to GBV services.
    - The case was referred to authorities (with the participation and consent of the survivor).
    - The survivor chooses not to make / withdraw a formal complaint.
    - The project investigated and:
      - It was not linked to the project (but the survivor was referred to GBV services).
      - Did not determine that there was a breach of the Code of Conduct.
      - Took disciplinary action against the alleged perpetrator.
- e) All complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy in a confidential and secure location.

## **GRM Specifics Component 1: Improving Reliability of Electricity Supply in Pohnpei**

This component will address PUC's challenges with insufficient available generation capacity, which is way below the installed capacity, to stably cover peak demand, and unscheduled shutdowns of power supply and unsecure waste oil storage. The component will finance (i) medium speed diesel gensets of about 7.5 MW total, which will serve base load and provide appropriate redundancy; (ii) consultancy work for feasibility studies and supervision; (iii) associated grid facilities in Pohnpei to improve the operational performance and generation capacity of PUC; (iv) waste oil storage tank and spill containment (v) removal of obsolete generation equipment and (v) electromechanical and electronic equipment, such as a power system SCADA, measuring, monitoring, and protection devices, and converters to help PUC improve its operational performance.

### **How to get in Touch with the Project for Component 1:**

Anyone can ask for information on the project, express a concern, make a complaint (grievance) or get in touch with the project for any reason. Complaints/concerns can be anonymous and the various ways to get in touch with the project include:

### **FSM National Contacts**

#### **Division of Energy**

All correspondence to: Assistant Secretary, Ms. Elina Akinaga and Mr. Charles Butts SEDAP Project Manager.

1. By Phone: (691) 320- 5133
2. By email: [eakinaga@fsmrd.fm](mailto:eakinaga@fsmrd.fm) and [Charlie.sedap@gmail.com](mailto:Charlie.sedap@gmail.com) copy to [beulah.fsm@gmail.com](mailto:beulah.fsm@gmail.com), [wkilmete@yahoo.com](mailto:wkilmete@yahoo.com) and [Steve@iasaustralia.com](mailto:Steve@iasaustralia.com)
3. By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941
4. In person: Department of Resources and Development National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Departments Office Secretary.
5. Website: [www.fsmrd.fm](http://www.fsmrd.fm)

#### **Pohnpei Utilities Corporation (PUC):**

All correspondence to: General Manager, Mr Nixon Anson

1. By Phone: (691) 320- 2374 (Nanpohnmal Power Plant 320-2078)
2. By email: [nanson@mypuc.fm](mailto:nanson@mypuc.fm) copy to [beulah.fsm@gmail.com](mailto:beulah.fsm@gmail.com) [wkilmete@yahoo.com](mailto:wkilmete@yahoo.com) and [Steve@iasaustralia.com](mailto:Steve@iasaustralia.com)
3. By mail: Post Office Box C, Kolonia, Pohnpei, FSM 96941
4. In person: Town Hall Street, Kolonia, Pohnpei, Federated States of Micronesia. Give to the Office Secretary.
5. Website: [www.pohnpeistate.gov.fm](http://www.pohnpeistate.gov.fm) and/or [www.pohnpeipuc.fm](http://www.pohnpeipuc.fm)

### **Roles and Responsibilities**

The following are persons involved in the complaints process and their supporting roles and responsibilities.

- Focal Point for managing the FSM SEDAP projects Complaints Process: Mr. Charles Butts, SEDAP Project Manager.
- Person who will manage the database and record keeping: Mr. Wilmer Kilmete in coordination with Ms. Beulah Daunakamakama at the Central Implementation Unit (CIU) of the FSM Government Department of Finance & Administration.
- Person who will answer simple queries and manage simple complaints: Mr. Charles Butts, SEDAP Project Manager.
- Person who will manage difficult complaints or grievances: Mr. Charles Butts, SEDAP Project Manager and Ms. Elina Akinaga, Assistant Secretary with support from CIU.
- Agency/Person who will prepare report for World Bank reporting: CIU.
- Grievance Committee will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Assistant Secretary level or above) from the following:
  - Department of Finance & Administration (DoFA) with support from CIU Safeguards Specialist;
  - Department or Office managing the project at which the complaint is aimed (Pohnpei Utilities Corporation);

#### The Complaints Process:

All complaints or grievances will be entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation etc.) are stored both electronically and in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e. 2019-01, 2019-02 etc.).

Each complaint/grievance is assigned a specific person responsible for its management and close out.

Each complaint or grievance will have a plan for addressing and closing out:

- If the complaint/grievance relates to a contractor activity, the project will ensure the Contractor remedies any damage, pays compensation for damage or loss, etc.
- Use of community leaders and customary methods of conflict resolution is encouraged and utilized if and when appropriate – on a case-by-case basis.
- If an issue/complaint cannot be resolved on site, it is elevated to the Project Manager for resolution (with support from the Safeguards team in the CIU). If the Project Manager and Safeguards Specialist cannot resolve the issue, it is referred to the ad hoc Grievance Committee.
- If a resolution cannot be found through the Grievance Committee, the next course of action is the courts of FSM or an independent mediator.

All simple complaints and grievances must aim to be closed out within 1 month.

Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.

All complainants have the right to use the courts of FSM at any time to seek resolution, if and when required.

The SEDAP Project Manager will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances if and when required.

#### Reporting and Evaluation:

Complaints shall be reported in the regular project reporting to the World Bank. It should contain:

- Total number of complaints/grievances received.
- Total number resolved.
- Total number under investigation/not yet resolved.
- Total number not yet resolved and also exceeds the recommended close out time of 1 month or 3 months.

Short paragraph on any significant grievances currently not yet resolved and any risks to project implementation.

- If there are more than 30 complaints/grievances recorded, the Project Manager may decide to investigate any patterns or repetition of issues that need addressing. The Project Manager may decide to get an independent consultant to review and provide advice.

## 4 How to get in Touch with the Project

Anyone can ask for information on the project, express a concern, make a complaint (grievance) or get in touch with the project for any reason. Complaints/concerns can be anonymous, treated confidentially and the various ways to get in touch are provided in the table below:

Table 1: FSM National Contacts	
<b>General GM:</b>	<p><b>FSM SEDAP Project Manager</b></p> <p><b>All correspondence to:</b> Mr. Charlie Butts SEDAP Project Manager</p> <p>By Phone: (691) 320-5133 By email: <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a> By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941 In person: Department of Transportation, Communication and Infrastructure, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department's Office Secretary. Website: <a href="http://tci.gov.fm">tci.gov.fm</a></p> <hr/> <p><b>Department of Transportation, Communication &amp; Infrastructure (DoTC&amp;I)</b></p> <p><b>All correspondence to:</b> Assistant Secretary, Ms. Elina Akinaga, Department of Transportation, Communications and Infrastructure.</p> <p><b>By Phone:</b> 691) 320-5133 <b>By Email:</b> <a href="mailto:eakinga@fsmrd.fm">eakinga@fsmrd.fm</a> and copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> and <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a>. <b>By Mail:</b> Post Office Box PS-2, Palikir, Pohnpei, FSM 96941 <b>In Person:</b> Department of Transportation, Communication and Infrastructure, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department's Office Secretary. <b>Website:</b> <a href="http://tci.gov.fm">tci.gov.fm</a></p>
<b>GBV specific GRM:</b>	<p><b>All correspondence to:</b></p> <p>Mr. Stuart Penias Assistant Secretary of Social Affairs FSM Department of Health &amp; Social Affairs (DHSA) <b>By Phone:</b> (691) 320-4682 <b>By Email:</b> <a href="mailto:SPenias@fsmhealth.fm">SPenias@fsmhealth.fm</a> <b>In Person:</b> C/o Department of Health &amp; Social Affairs, Room 5, Capital Suite, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Mr. Kwame Shiroya Program Coordinator, Central Implementation Unit (CIU)</p>

	<p>FSM Department of Finance and Administration (DOFA)  <b>By Phone:</b> (691) 320-2639  <b>By Email:</b> <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a>  <b>In Person:</b> C/o Department of Finance and Administration, FSM National Government, Palikir, Pohnpei.</p>
<b>Table 2: FSM State Contacts</b>	
<b>Pohnpei State</b>	
<b>General GM</b>	<p><b>FSM SEDAP Project Manager</b></p> <p><b>All correspondence to:</b> Mr. Charlie Butts  SEDAP Project Manager</p> <p>By Phone: (691) 320-5133  By email: <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to  <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a>  By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941  In person: Department of Transportation, Communication and Infrastructure, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department's Office Secretary.  Website: <a href="http://tci.gov.fm">tci.gov.fm</a></p>
<b>GBV Specific GRM</b>	<p><b>All GBV grievance correspondence to:</b></p> <p>Ms. Canita R Nakamura  GBV Counsellor  <b>By Phone:</b> (691) 320-2112  <b>By Email:</b> <a href="mailto:rilometoc@prel.org">rilometoc@prel.org</a>  <b>In Person:</b> C/o PREL Office, Dolonier, Nett.</p>
<b>Chuuk State</b>	
<b>General GM</b>	<p><b>FSM SEDAP Project Manager</b></p> <p><b>All correspondence to:</b> Mr. Charlie Butts  SEDAP Project Manager</p> <p>By Phone: (691) 320-5133  By email: <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to  <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a>  By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941  In person: Department of Transportation, Communication and Infrastructure, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department's Office Secretary.  Website: <a href="http://tci.gov.fm">tci.gov.fm</a></p> <p>OR</p> <p><b>Chuuk Public Utility Corporation (CPUC)</b></p> <p>All correspondence to: CEO Mr. Kasio "kembo" Mida, Jr.</p> <p>By Phone: (691) 330-2400/2476  By email: <a href="mailto:kembo.mida@cpuc.fm">kembo.mida@cpuc.fm</a> and <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a>  copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wkilmete@yahoo.com">wkilmete@yahoo.com</a>  By mail: Post Office Box 910, Weno, Chuuk, FSM 96942  In person: Weno Island, Chuuk State, Federated States of Micronesia. Give to the Office Secretary.</p>



	Website: <a href="http://www.cpuc.fm">www.cpuc.fm</a>
<b>GBV Specific GRM</b>	<p><b>All GBV grievance correspondence to:</b></p> <p>Ms. Christina “Kiki” Stinnet  President – Chuuk Women Council  <b>By Phone:</b> (691) 330-8397  <b>By Email:</b> <a href="mailto:kikistinnetcwc@gmail.com">kikistinnetcwc@gmail.com</a>  <b>In Person:</b> CWC, Tongen Inepwinepw Counseling Center</p> <p>OR</p> <p>Ms. Jasyuri Fritz  Assistant Coordinator/ ANT Focal Pont-Chuuk  FSM Department of Justice (DoJ)  <b>By Phone:</b> (691) 330-5977  <b>By Email:</b> <a href="mailto:j.fritz.fsm@gmail.com">j.fritz.fsm@gmail.com</a>  <b>In Person:</b> FSM National Police Office, Weno</p>
<b>Yap State</b>	
<b>General GM</b>	<p><b>FSM SEDAP Project Manager</b></p> <p><b>All correspondence to:</b> Mr. Charlie Butts  SEDAP Project Manager</p> <p>By Phone: (691) 320-5133  By email: <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to  <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a>  By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941  In person: Department of Transportation, Communication and  Infrastructure, National Government, Palikir, Pohnpei, Federated  States of Micronesia. Given to the Department’s Office Secretary.  Website: <a href="http://tci.gov.fm">tci.gov.fm</a></p> <p>OR</p> <p><b>Yap State Power Utility Company (YSPSC)</b></p> <p>All correspondence to: General Manager: Mr. Victor Nabaian.</p> <p>By Phone: (691) 350-4427  By email: <a href="mailto:vnabeyan@gmail.com">vnabeyan@gmail.com</a> and <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a>  copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a>  By mail: Post Office Box 667, Colonia, Yap State, FSM 96943  In person: YSPSC Office, Colonia, Yap State, Federated States of  Micronesia. Give to the Office Secretary.  Website: <a href="http://www.yapstategov.org">www.yapstategov.org</a></p>
<b>GBV Specific GRM</b>	<p><b>All GBV grievance correspondence to:</b></p> <p>Ms. Linda Teteth  Women Interest officer  Women Interest Office  <b>By Phone:</b> (691) 350-5973  <b>By Email:</b> <a href="mailto:lmteeth@gmail.com">lmteeth@gmail.com</a>  <b>In Person:</b> Women Interest Office, Yap State Government.</p>
<b>Kosrae State</b>	

<p><b>General GM</b></p>	<p><b>FSM SEDAP Project Manager</b></p> <p><b>All correspondence to:</b> Mr. Charlie Butts SEDAP Project Manager</p> <p>By Phone: (691) 320-5133 By email: <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a> By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941 In person: Department of Transportation, Communication and Infrastructure, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department's Office Secretary. Website: <a href="http://tci.gov.fm">tci.gov.fm</a></p> <p>OR</p> <p><b>Kosrae Utilities Authority (KUA)</b></p> <p>All correspondence to: Customer Service Supervisor &amp; Legal Counsel: Mr. Casey Freddy.</p> <p>By Phone: (691) 370-3799/3344 By email: <a href="mailto:caseyfreddy9@outlook.com">caseyfreddy9@outlook.com</a>, <a href="mailto:KUA@mail.fm">KUA@mail.fm</a> and <a href="mailto:Charlie.sedap@gmail.com">Charlie.sedap@gmail.com</a> copy to <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a> &amp; <a href="mailto:wilmer.kilmete@dofa.gov.fm">wilmer.kilmete@dofa.gov.fm</a> By mail: Post Office Box KUA, Tofol, Kosrae State, FSM 96944 In person: KUA Office, Tofol, Kosrae State, Federated States of Micronesia. Give to the Office Secretary. Website: <a href="http://www.kosraepower.com">www.kosraepower.com</a></p>
<p><b>GBV Specific GRM</b></p>	<p><b>All GBV grievance correspondence to:</b></p> <p>Ms. Beverly Wabol Council Member Kosrae Women's Association <b>By Phone:</b> (691) 370-3008/3208 <b>By Email:</b> <a href="mailto:beverlywabol@gmail.com">beverlywabol@gmail.com</a> <b>In Person:</b> Department of Education, Kosrae State Government, Tofol.</p> <p>OR</p> <p>Ms. Lelean Kephass Assistant Coordinator/AHT Focal Point - Kosrae FSM Department of Justice <b>By Phone:</b> (691) 370-3008/3208 <b>By Email:</b> <a href="mailto:lelean.kephas@doi.gov.fm">lelean.kephas@doi.gov.fm</a> <b>In Person:</b> Kosrae Anti-Human Trafficking Office, Tofol.</p>

## 5 Roles and Responsibilities

The following are persons involved in the complaints process and their supporting roles and responsibilities. All parties are expected to disclose conflicts of interest or potential conflicts of interest as new complaints arise, and recuse themselves accordingly. Should there be a conflict of interest with anyone in the following list, that individual will be placed with a designated alternative.

### General GM:

- **Focal Point for managing the FSM SEDAP projects Complaints Process:** Mr. Charlie Butts, Project Manager for the SEDAP Projects ([Charlie.sedap@gmail.com](mailto:Charlie.sedap@gmail.com)).
- **Person who will manage the database and record keeping:** Mr. Wilmer Kilmete (National Safeguard Coordinator) and Mr. Kwame Shiroya (Program Coordinator) at the Central Implementation Unit (CIU) of the FSM Government Department of Finance & Administration (DoFA).
- **Person who will answer simple queries and manage simple complaints:** Mr. Charlie Butts, Project Manager for the SEDAP Projects ([Charlie.sedap@gmail.com](mailto:Charlie.sedap@gmail.com)).
- **Person who will manage difficult complaints or grievances:** Mr. Charlie Butts, Project Manager for the SEDAP Projects ([Charlie.sedap@gmail.com](mailto:Charlie.sedap@gmail.com)) and Ms. Elina Akinaga, Assistant Secretary DTC&I with support from CIU.
- **Person/organization who will prepare report/s for World Bank reporting:** CIU (DoFA) team.
- **Grievance Committee** will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Assistant Secretary level or above) from the following:
  - Department of Finance & Administration (DoFA) with support from CIU Safeguards Specialist;
  - Department or Office managing the project at which the complaint is aimed (FSM DoCT&I); and
  - Department of Justice FSM National Government and/or State departments of Justice.

### GBV Specific GM:

For all GBV (SEA/SH) grievance related issues the following are persons involved in the complaints process and their supporting roles and responsibilities.

**Focal point for managing the FSM TCC projects complaints process:** Mr. Charlie Butts, Project Manager for the SEDAP Projects ([Charlie.sedap@gmail.com](mailto:Charlie.sedap@gmail.com)) or a designee (who has been trained in handling complaints of GBV and HT) where there is a conflict of interest.

**Person who will manage the database and record keeping:** Mr. Wilmer Kilmete (National Safeguard Coordinator) in coordination with Mr. Kwame Shiroya (Program Coordinator) at the Central Implementation Unit (CIU) of the FSM Government Department of Finance & Administration (DoFA).

**Person(s) who will answer simple queries and manage simple complaints:**

Mr. Charlie Butts, Project Manager for the SEDAP;

The GBV service providers / trainers / women's rights advocates who are women and experienced in responding to GBV.

**Person who will communicate with the survivor:** Mr. Charlie Butts, Project Manager for the SEDAP or where the survivor has chosen to speak to a woman, a

woman (who has been trained in handling complaints of GBV) will be delegate this role by the SEDAP Project Manager.

**Person who will assess if the allegation is likely linked to the project:** Mr. Charlie Butts, Project Manager for the SEDAP.

**Person who will inform DTC&I and DoJ of the allegation:** Mr. Charlie Butts, Project Manager for the SEDAP.

**Person who will inform the World Bank Task Team of the allegation:** Mr. Charlie Butts, Project Manager for the SEDAP.

**Person(s) who will verify the allegation:** GBV Grievance Committee, led by Mr. Charlie Butts, Project Manager for the SEDAP.

**Person(s) who will determine disciplinary action:** GBV Grievance Committee, led by Mr. Charlie Butts, Project Manager for the SEDAP.

**Person(s) who will take disciplinary action:** Employer of the perpetrator.

**GBV Grievance Committee will be formed on an ad hoc basis where verification and action is required. This will be made up of the following:**

- Mr. Charlie Butts, Project Manager for the SEDAP Projects.
- Senior officials (Assistant Secretary level or above) or designee from:
  - Department of Finance & Administration (DoFA) with support from CIU Safeguard Team;
  - Department or Office managing the project at which the complaint is aimed (DoTC&I);
  - Department of Justice FSM national Government and/or State department of Justice.
- Representative of the employer of the alleged perpetrator;
- GBV service provider / trainer specialist.

## 6 The Complaints Process

All complaints or grievances will be entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation etc.) are stored both electronically and in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e., 2021-01, 2021-02 etc.).

Each complaint/grievance is assigned a specific person responsible for its management and close out.

If the complaint/grievance relates to a contractor activity, the project will ensure the Contractor remedies any damage, pays compensation for damage or loss, etc. In cases of GBV related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.

Use of community leaders and customary methods of conflict resolution is encouraged and utilized if and when appropriate – on a case-by-case basis. In cases of GBV related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

If an issue/complaint cannot be resolved on site, it is elevated to the SEDAP Project Manager for resolution (with support from the CIU Program Officer and Safeguards Team). If the SEDAP Project Manager and CIU team cannot resolve the issue, it is

referred to the DoTC&I Secretary and Project Steering Committee if the issue is not resolved then it is forward to the ad hoc Grievance Committee.

If a resolution cannot be found through the Grievance Committee, the next course of action is the state or national courts of the FSM or an independent mediator.

All simple complaints and grievances must aim to be closed out within 1 month.

Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.

All complainants have the right to use the state and national courts of the FSM at any time to seek resolution, if and when required.

The SEDAP Project Manager will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances if and when required.

## **7 Reporting and Evaluation**

Complaints shall be reported in the regular project reporting to the World Bank. It should contain:

- Total number of complaints/grievances received.
- Total number resolved.
- Total number under investigation/not yet resolved.
- Total number not yet resolved and also exceeds the recommended close out time of 1 month or 3 months.

Short paragraph on any significant grievances currently not yet resolved and any risks to project implementation.

In the case of GBV/SEA/SH, reporting to the World Bank is required only after it has been determined if the allegation is related to the project.

If an allegation is determined to be likely to be linked to a project, DoTC&I must notify the World Bank Task Team of the anonymized incident as soon as it becomes known to DoTC&I. Only the following key pieces of data should be shared with the World Bank Task Team:

- The nature of the allegation;
- If the alleged perpetrator is, to the survivor's best knowledge, associated with the project (yes/no);
- The survivor's age and/or sex (if available);
- If the survivor was referred to services.

If there are more than 30 complaints/grievances recorded, the SEDAP Project Manager may decide to investigate any patterns or repetition of issues that need addressing. The SEDAP Project Manager may decide to get an independent consultant to review and provide advice.

In the case of third-party complaints of GBV, if there is a substantial number of consistent third-party complaints registered in relation to a specific incident or an alleged perpetrator or survivor the SEDAP Project Manager may decide to investigate but this must be done in a way that ensure the safety and confidentiality of the survivor, ideally through a GBV service provider who will be able to safely and sensitively contact the survivor involved.

## 8 Appendices

### 8.1 Annex 1: GBV Support service at each Project Site (State)

SPECIALIZATION:			GBV	GENERAL		
SERVICE			LOCATION			
			Chuuk State	Kosrae State	Pohnpei State	Yap State
ACCESS TO JUSTICE	Law enforcement and protection	Police	Emergency: 911		National Police: 320 2628	
			Chuuk Police: 330 3612	DV Taskforce: 320 2221	Pohnpei Police: 350 3333 / 2132	Yap Police: 350 3333 / 2132
				Kosrae Police: 370 3333		
		Maritime Police: 320 2700				
Legal aid	MLSC	<a href="mailto:legalhelp@mlsnet.org">legalhelp@mlsnet.org</a>				
		330 2597 / 5597	370 3032	320 2404 / 3762	350 2193	
	Cutting Edge Advocacy			320 7400 / 922 3311		
MEDICAL	Basic and specialized medical care	State Hospital	330 7936	370 3012	320 2214 / 2215 320 2213 (emergency)	350 2110
COUNSELING	Counseling and referrals		CWC, Tongen Inepwinew Counseling Centre (TICC)	Not Identified	Individual Counselors (female, Kolonia): Lululeen: 320 5142 Canita: 320 2112	Behavioral Health & Wellness, Yap State Hospital: 350 2110
SAFE HOUSE	Short / medium and long-term accommodation		FSM National Police and Human Trafficking Crisis Centre	Not Identified	None Yet Established	None Yet Established
	Emergency accommodation		Police: 330 3612			

		Chuuk State Hospital: 330 7936			
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## 8.2 Annex 2: Forms to register the GBV/SEA/SH Complaint

### Form A: Register the GBV/SEA/SH Complaint

***There should be no identifying information included anywhere on this form including survivor and alleged perpetrators names and contact details.***

1. Date complaint was received: \_\_\_\_\_

2. Person complaint was received by: \_\_\_\_\_

3. Was the person who made the complaint the survivor?  Yes  No

4. The nature of the allegation (what a survivor says in their own words):  
\_\_\_\_\_  
\_\_\_\_\_

If it was the survivor who made the complaint answer questions 5 -9 (if a third party made the complaint, only answer questions 1-4).

5. Is, to the best of the survivor's knowledge, the perpetrator  Yes  No is associated with the project?

6. Age of the Survivor (if possible):

Female  Male

7. Sex of the Survivor (if possible):

Other  Choose not to answer

8. What Services was the Survivor Referred to (provide name of service):

Yes  No Name of  
a. Justice Service

Yes  No Name of  
b. Medical Service

Yes  No Name of  
c. Safe House Service

Yes  No Name of  
d. Counseling Service

Yes  No Name of  
e. Other Service

9. Does the Survivor consent to communicate the allegation to the FSMIP  Yes  No Project Manager?

a. If yes, complete Form B and give to the FSMIP Project Manager along with a copy of this completed form.

## Form B: Communicate the GBV/SEA/SH Allegation to the FSMIP Project Manager

*This form should only be completed with the consent of the survivor to communicate the allegation to the FSMIP Project Manager*

1. Name of the survivor: \_\_\_\_\_
2. How does the survivor want the project to contact them to follow-up on the complaint?

## Form C: Consent Form

**DID THE SURVIVOR CONSENT TO:**

**SIGNATURE/THUMBPRINT OF SURVIVOR OR GUARDIAN (FOR CHILDREN UNDER 18)**

**DATE**

**Step 1. Receive the Complaint**

- 1. Have their complaint documented and registered?  Yes  No
- 2. Communicate their complaint to the FSMIP Project Manager?  Yes  No


**Step 2. Assess if the allegation is likely linked to the project**

- 3. Share information about the complaint with the contractor / alleged perpetrators employer?  Yes  No
- 4. Share information about the complaint with DoTC&I and DoJ?  Yes  No
- 5. Share information about the complaint with the World Bank?  Yes  No


**Step 3. Verify and Act**

- 6. Be interviewed by the FSMIP Project Manager about the complaint?  Yes  No
- 7. Share information about the complaint with the alleged perpetrator?  Yes  No
- 8. Share information about the complaint with the any witnesses?  Yes  No
- 9. Share information gathered by the FSMIP Project Manager with other members of the ad hoc committee?  Yes  No


**Step 4. Monitor, track, and provide regular reports of the allegation**

10. Share which services they were referred to with the DoTC&I and DoJ?  Yes  No

11. Share what action was taken to resolve the complaint with the DoTC&I and DoJ?  Yes  No

**Step 5. Communicate with the Survivor**

12. Ongoing communication from the FSMIP Project Manager about the complaint?  Yes  No